



521 Newman Springs Road, Suite 23
Lincroft, New Jersey 07738
P: (732) 852-7500
F: (888) 635-1653
www.klugerhealey.com

DAVID A. WARD
dward@klugerhealey.com
Admitted in NJ and NY

May 6, 2024

Via ECF

Honorable Margaret M. Garnett, USDJ
United States District Court
Southern District of New York
40 Foley Square, Room 906
New York, NY 10007

**Re: Quantum Technology Innovations, LLC v. Showtime Networks, Inc., et al.
24cv1103 (MMG)
Letter Motion Requesting Extension of Time and Adjournment of
Conference on Consent**

Your Honor:

We represent Plaintiff Quantum Technology Innovations, LLC in the above matter. We write with the consent of our adversary to request an extension of time to respond to the Rule 12(b)(6) motion to dismiss filed by Defendants on April 29, 2024. Pursuant to Local Civil Rule 6.1(b), our opposition is currently due Monday, May 13, 2024. Pursuant to Your Honor's Individual Rule II(B)(6), Plaintiff has 21 days from the filing to elect to amend the Complaint or respond to the motion. We require additional time to make that determination and to work with co-counsel (Randall Garteiser, Esq.) who will soon be filing an application to appear *pro hac vice* in this matter as trial counsel.

Accordingly, Plaintiff requests a 28 day extension of time within which to either file an Amended Complaint or respond to Defendants' motion to dismiss (from May 13, 2024 to June 10, 2024). In light of this request, Plaintiff also requests that the May 14, 2024 Rule 16 Conference be adjourned accordingly, to June 11, 2024 or such other time as is convenient for the Court, so that Mr. Garteiser has sufficient time to assess this matter and the parties may properly confer, prepare and submit the appropriate proposed scheduling order depending on Plaintiff's response to the motion to dismiss.

Fairfield, NJ

New York, NY

Philadelphia, PA



Honorable Margaret M. Garnett, USDJ

May 6, 2024

Page 2

This is our first request for an extension. The parties are scheduled to appear for a pretrial conference on May 14, 2024. This request, if granted, will impact the scheduled Rule 16 conference by less than four weeks.

Thanking the Court for its consideration in this regard, I remain,

Respectfully yours,

/s/ David A. Ward
DAVID A. WARD

cc (via ECF): Sharon Davis, Esq.
Michael Jones, Esq.
Randall Garteiser, Esq.